

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of )  
 )  
Allocation of Spectrum in the 5 GHz )  
Band to Establish a Wireless Component )  
of the National Information Infrastructure )  
 )

RM-8653

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

AND

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In the Matter of )  
 )  
Petition for Rulemaking To Allocate )  
the 5.1-5.35 GHz Band and Adopt )  
Service Rules for a Shared Unlicensed )  
Personal Radio Network )

RM-8648

To: The Acting Secretary

**REPLY OF THE PART 15 COALITION**

The Part 15 Coalition ("the Coalition") submits this reply to the comments filed in the above-referenced matters. In RM-8653 (the "NII Band Petition") and RM-8648 (the "WINForum Petition"), Apple Computer, Inc., and the Wireless Information Networks Forum have asked the Commission to initiate a rulemaking proceeding to allocate spectrum in the 5 GHz range for unlicensed wireless communications technologies.

The response in favor of the two petitions has been overwhelming. Of the approximately 250 comments filed in response to these petitions, all but a handful are in support.<sup>1</sup> The Coalition is encouraged by this show of support, particularly for the NII Band Petition, which advocates an allocation of spectrum that would permit current unlicensed Part 15 technologies to evolve into higher-

<sup>1</sup> Opposition to the proposals was minimal. For instance, Pulson Communications argued that the entire 2.5-8.5 GHz band should be cleared for ultra-wideband technologies. A few parties expressed concerns regarding band sharing arrangements. See, e.g., Comments of Loral/Qualcomm Partnership, L.P.; the American Radio Relay League, Inc.

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bandwidth, advanced information technologies and become an integral part of the NII.

Use of this portion of spectrum for advanced unlicensed services would provide countless public and private benefits. For instance, parties to this proceeding described how the wireless NII Band would promote educational goals, enhance public participation in the political process, benefit small and entrepreneurial companies, link rural and low income areas to the information superhighway, improve healthcare, and conserve energy and other valuable resources.<sup>2</sup> The Coalition is made up of companies that will be involved in each of these various aspects of the wireless information revolution because Part 15 technologies span the entire spectrum of wireless communications services. The comments to these petitions demonstrate that the creation of an NII Band, as described by Apple, would transform the capabilities of unlicensed wireless technologies and enable them to keep pace with advances in computer and communications technologies.

Although technical details regarding band sharing and spectrum etiquette rules remain to be resolved, the NII Band Petition offers the greatest opportunity to promote the roll-out of these new services. Thus, the Coalition supports the petition for rulemaking filed by Apple Computer, Inc., and urges the Commission to act swiftly to initiate a rulemaking proceeding on these issues.

Respectfully submitted,



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July 25, 1995

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<sup>2</sup> See, e.g., Comments of the Council of Chief State School Officers; the Center for Democracy and Technology; Cannon Research; the electronic Frontier Foundation; Michael Silverberg; Metricom.

### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Reply Comments of the Part 15 Coalition, was sent by first-class mail, postage prepaid, this 25th day of July, 1995, to each of the following:

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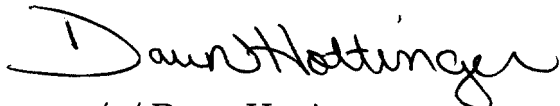
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